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4 Q Okay. When you say "the conditions," the
5 conditions of your signing it, correct?

6 A Yes.

7 Q But in any event, you'll agree with me that
8 Exhibit 2 was not provided to you vis-a-vis the
9 computer, it was handed to you, more than likely, by
10 Mr. Enloe?

11 A Because it's handwritten, I'm assuming it was
12 handed to me. It's a handwritten thing.

13 Q Okay. Now, one second, Ms. Arreguin. Maybe I
14 asked this question before. But when you worked for --
15 when you were working for World Financial Group selling
16 securities and insurance, did you sign a similar
17 contract to Exhibit 2?

18 A I cannot say I did or I didn't because it's
19 too many years ago.

20 Q Okay.

21 A I have no idea.

22 Q It's a fair statement.

23 A Yeah.

24 Q Given the fact we're talking six to seven
25 years ago, you don't have a firm recollection?

□

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1 A I sure don't.

2 Q Okay. But in any event, you were approved for
3 World Lending Group, Inc., on or around July 29th, 2002?

4 A Yes.

5 Q And thereafter you commenced doing work for
6 World Lending Group, Inc.?

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7 A Yes.
8 Q Okay. And how long did you work for world
9 Lending Group, Inc.?
10 A Well, I have a couple pay stubs up to
11 2003 --
12 Q Okay.
13 A -- that says "World Lending Group."
14 Q All right. Do you have a recollection as to
15 how long you worked for World Lending Group, Inc.?
16 A You know, I'm going to guess that --
17 Q We don't want you to guess.
18 A Exactly. Well, then I can't tell.
19 Q You can just say "I don't know."
20 A I don't know.
21 Q But at some point -- and you ultimately --
22 what did you do for World Lending Group, Inc.?
23 A I was a senior -- World Lending Group?
24 Q Yes, World Lending Group, Inc.
25 A I came in as a senior associate. And around

□

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1 September, October, November of 2002, I became a
2 director, because I was hiring a lot of people -- or
3 walked them through.
4 Q You came in as a senior associate?
5 A Right, and went to a regional marketing
6 director.
7 Q And then regional marketing director?
8 A Right.
9 Q And working for World Lending Group, Inc., you

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10 were originating loans, right --

11 A Right.

12 Q -- loan applications?

13 A That's all we did.

14 Q That was your job?

15 A Uh-huh.

16 Q And you got paid for it, right?

17 A Yes.

18 Q At least in terms of when you closed the loan?

19 A Right.

20 Q Okay. And you did that until -- at least

21 your understanding is until about 2003 for World Lending
22 Group, Inc.?

23 A Yes.

24 Q All right. And then at some point, though,
25 you did start doing work for Global Equity Lending?

□

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1 A when they changed the name.

2 Q All right.

3 A There was a big battle between World Savings
4 and World Leadership Group over the name -- World
5 Lending Group. It was a big, big deal, lawsuit. And I
6 don't know what happened. My understanding -- this is
7 the story they told us, that World Savings actually lost
8 that, but we're going to change our name anyway.

9 Q But in any event -- I'm just trying to
10 understand, ma'am -- World Lending Group, Inc., then
11 became Global Equity Lending, Inc.?

12 A Yes.

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- 13 Q Same company, though, right?
- 14 A Yes.
- 15 Q It basically changed the name, at least in
- 16 your mind, right?
- 17 A In my mind.
- 18 Q All right. So when you went to work for World
- 19 Lending Group, Inc., you worked for them until about
- 20 2003, correct?
- 21 A Yes.
- 22 Q And then you ended up working for Global
- 23 Equity Lending, Inc.?
- 24 A The name changed.
- 25 Q The name changed. So basically the same

□

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- 1 companies?
- 2 A Yes.
- 3 Q Okay. Did you sign any agreement at all for
- 4 Global Equity Lending, Inc., when the name changed?
- 5 A I couldn't tell you when or where or how, but
- 6 I can only say that, throughout the whole entire
- 7 process, they would shoot something on your web site and
- 8 it would say "the new agreement," "the new terms and
- 9 condition," "the new policy." Whatever it was that came
- 10 on your computer as you logged in, if you didn't sign
- 11 "yes," you would not get in. So at what time they
- 12 changed the contract or agreement or a policy or term
- 13 and condition? I mean, at the end, they were sending me
- 14 all kinds of stuff that I just didn't even agree with.
- 15 I couldn't even sign them anymore.

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16 Q This is 2003, right?
17 A During the whole process.
18 Q All right. I just want to back up. After
19 2003, you started working for Global Equity Lending?
20 A The name changed.
21 Q Okay. The name changed. And you don't have a
22 recollection of your signing an agreement with Global
23 Equity -- let me finish now. You're anticipating.
24 That's okay. We all do that. But you don't have a
25 recollection around 2003 of signing an agreement with

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1 Global Equity Lending, Inc.?
2 A I do not.
3 Q But you said that occasionally you would see
4 things pop up on your computer, correct?
5 A Exactly.
6 Q Were you given -- let me ask you something.
7 were you given any kind of password or
8 anything in order to get into the Global Equity -- or
9 world Lending Group, Inc., or Global Equity Lending,
10 Inc., sites?
11 A We were all given a code number.
12 Q A code number. What did the code number do?
13 A It identified you as that person with a
14 password.
15 Q So it allowed you to get into the site. Do
16 you remember what your code number is?
17 A AF0099, because I -- yes, Air Force 0099.
18 Great number. I was retired from the air force.

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19 Q AF0099. Let me make sure I got that right
20 here. what is it? AF --
21 A Air Force 0099.
22 Q So that way, you would never forget?
23 A Yeah. That was a good one for me.
24 Q And you were assigned that --
25 A Code number.

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1 Q -- code number when you commenced work for
2 WLG --
3 A Uh-huh.
4 Q -- correct?
5 You've got to say yes or no.
6 A Yes.
7 Q And that code number, AF0099, stayed with you
8 through Global Equity Lending, Inc., right?
9 A Yes.
10 Q You always had the same code number?
11 A Yes.
12 Q And any time you wanted to get into the web
13 site to, I guess, upload or download information, you
14 had to use that code?
15 A Yes.
16 Q All right. when you -- I want to go back to
17 something else, Ms. Arreguin. You said you had to pay
18 money --
19 A Yes.
20 Q -- do you remember that?
21 So I take it that when you signed up with

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22 World Lending Group in or around July 2002, you had to
23 pay some money in order to become a member?

24 A Yes.

25 Q How much money did you pay?

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1 A It was -- this is what I recollect now. It
2 could have been less at that time. But I believe it was
3 125 for world Leadership Group, and 125 for world
4 Lending Group. And the reason I said "if I can
5 recollect the exact figure" is because they changed that
6 figure and highered it later on, so I don't know if I
7 got caught up in that highering or, you know, the amount
8 or whatever, but I believe it was 250. It could be
9 less, but I believe --

10 Q It's kind of like an initiation fee or a
11 membership fee?

12 A Oh, absolutely. This is like -- the big
13 question was why do we have to pay 125 to world
14 Leadership Group? Nobody ever, ever really knew why.
15 why?

16 Q But you paid it with a check?

17 A We paid it with a money order. Usually they
18 wanted money orders.

19 Q Okay. You did the same thing with respect to
20 world Lending Group, right?

21 A Right.

22 Q So in order for you to go to work for world
23 Lending Group, you needed to pay that money?

24 A Right.

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25 Q was that something periodically that had to be

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1 paid?

2 A Then they started charging you -- I think it
3 was \$75 a year to keep your membership --

4 Q Okay.

5 A -- even though you were supposed to be an
6 employee.

7 Q Okay.

8 A That's when a lot of people started dropping
9 out. Forget it.

10 Q I'm trying to understand now. At least from
11 your testimony, your association begins with world
12 Lending Group in 2002, July, and it continues to when
13 you -- through the name change to Global Equity Lending,
14 correct?

15 A Right.

16 Q And then ends -- I believe it's in around
17 2007, when you leave that business; is that right?

18 A I believe I resigned, July.

19 Q You resigned.

20 A Something like that.

21 Q And periodically would you have to re-sign
22 documents?

23 A For what?

24 Q To maintain your relationship with Global
25 Equity Lending.

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1 A They would flip this stuff on the web site,
2 again, and it would be mixed in with marketing material,
3 it would be mixed in with agreements, terms and
4 conditions, policies. You know, whatever you signed,
5 you signed, because that's the only way you could get in
6 your computer. That's the truth. I mean, if they gave
7 you a little thing and it changed your whole -- you'd
8 never know it.

9 Q My question, though, is, you would get
10 periodic updates to the contract or supplements to the
11 contract; is that right?

12 A I'm going to guess. I don't know about --

13 Q I don't want you to guess.

14 A Okay. I don't know if that's what they
15 flashed up on the web site. I don't know. I
16 couldn't -- there wouldn't be a specific thing that
17 would make you say "ah-hah, this is a new change."

18 Q Did you -- well, let me ask you something.
19 I'm not trying to be argumentative.

20 A Yeah.

21 Q Do you recall -- after 2002, July 2002, after
22 you signed the World Lending Group document that we have
23 here, Exhibit 2, do you recall ever reviewing updates to
24 the contract through the computer?

25 A And I believe there were updates to the

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1 contract.

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2 Q All right. And how were you asked to agree to
3 those terms of the contract?

4 A They would post -- if there were anything
5 posted, they would run it all on the thing, and then
6 you'd -- I'd accept, I believe, or maybe -- I don't
7 know.

8 Q You'd have to type something into the
9 computer --

10 A Right.

11 Q -- to say you accept?

12 A Either you accept, or your name, or something.

13 Q And how would you do that? You would type in
14 your name?

15 A If it was your name, you'd type in your name.

16 Q Okay. In your case, it would be Dolores
17 Arreguin?

18 A Right. And then that would be it.

19 Q And then you -- I'm sorry.

20 A Or they would have something that would say "I
21 accept," and you click on "I accept," or "don't accept,"
22 you know.

23 Q So you were given an option, right?

24 A But I think those were, like, on tests you had
25 to take or something. Sexual harassment, I think they

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1 had one of those. You take it, you accept it now, or
2 you want to do it later. You know what I'm saying?
3 Things like that.

4 Q What I want to focus on is just the

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5 supplements to the contract. You recall getting
6 supplements to the contract or periodic reviews to the
7 contract, do you not?

8 A I do not recall.

9 Q Okay. That's all I needed to know.

10 A I recall a lot of documents coming up on the
11 web site and they could have been some supplements. I
12 just recall a lot of documents coming up all the time.

13 Q Okay. And you recall looking at those
14 documents. And do you have a firm -- do you have a
15 recollection of ever typing your name, Dolores Arreguin,
16 on any of those documents?

17 A I'm sure everyone did, because you couldn't
18 get in your web site unless you did that.

19 Q Okay.

20 A You couldn't get in.

21 Q Do you have any recollection, after July 2002,
22 of ever typing your name onto the web site in order to
23 either accept or reject a contract?

24 A I'm sure I did, yes.

25 Q Okay. Because that would have happened,

□

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1 right?

2 A It would have happened.

3 Q And that was part of the routine that you --

4 A Part of the routine, if you agreed with it or
5 you didn't. You'd just either agree or you're not going
6 to get no more.

7 Q Okay. Now, going back to our Exhibit 2, this

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8 is the document that you believe Mr. Enloe -- is it
9 E-n-l-o-w?

10 A L-o-e.

11 Q L-o-e. All right.

12 -- provided to you?

13 We were looking at that earlier. Did you
14 maintain a copy of this document, Exhibit 2?

15 A I don't recall having a copy of this.

16 Q So even though you signed the document, you
17 didn't maintain a copy for yourself?

18 A Yeah, I don't recall.

19 Q All right.

20 A I don't have a file of this document.

21 Q Okay. When you were provided a copy of
22 Exhibit 2 -- and I think you said you didn't review it;
23 is that right?

24 A I don't recall how I --

25 Q You don't recall reviewing it?

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1 A -- how I did this whole package.

2 Q Okay. So you could have reviewed it, but you
3 just don't have a recollection?

4 A I don't have a recollection.

5 Q Do you know what an arbitration clause is?

6 A Well, if you have some differences, you
7 arbitrate.

8 Q Okay. Did you -- was that your understanding
9 of what an arbitration clause was in July 2002?

10 A No, I --

11 Q You had a different understanding?
12 A I had no understanding of arbitration.
13 Q Okay.
14 A I've never had an arbitration problem, I don't
15 think, that we had to arbitrate.
16 Q You never went to arbitration?
17 A Right.
18 Q All right. You ever own a home?
19 A Yes.
20 Q Did you go through the process of buying a
21 home --
22 A Yes.
23 Q -- through a real estate agent?
24 A Yes.
25 Q Were you ever given an option to check an

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1 arbitration -- mandatory arbitration clause in a real
2 estate contract?
3 A I think we sat down, went over the paperwork,
4 but I don't recall that. No, I don't recall that even
5 being a discussion.
6 Q Okay. You'll agree with me, though, when you
7 went out and -- you have owned homes, right?
8 A Yes.
9 Q Before July 2002, right?
10 A Right.
11 Q And as part and parcel of buying a home, you
12 would end up looking at a contract, right?
13 A Right.

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14 Q Real estate agents give it to you, right?

15 A Right.

16 Q And had your real estate agent ever explained

17 to you what an arbitration clause was?

18 A I need to talk to him for a minute.

19 Q Sure.

20 A Is that okay?

21 Q You can do whatever you want. In fact, this

22 is a good time to take a break.

23 (Recess.)

24 THE REPORTER: There was a question pending.

25 would you like it read back?

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1 MR. GENTILE: Oh, yes.

2 (Record read as follows:

3 "Question: And had your real estate

4 agent ever explained to you what an

5 arbitration clause was?")

6 THE WITNESS: No, I don't recall --

7 BY MR. GENTILE:

8 Q All right.

9 A -- that being a topic of conversation when we

10 were buying. In fact, we actually bought the property,

11 and then -- from a realtor, and then built a house, so

12 there was no -- that I recall --

13 Q Okay. Understood.

14 A -- conversation about that.

15 Q All right. Now, if you look at Exhibit 2,

16 Bates-stamped document GEL023, what I'm going to look at

17 there is a paragraph 7.1. ARRE0512

18 You see that it says "Arbitration of
19 Grievances"? Do you see that?

20 A Uh-huh.

21 Q Okay. You can say yes or no.

22 A Yes. I'm sorry.

23 Q All right. From what you're telling me, is
24 you never reviewed this part of the contract before you
25 signed it?

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1 A Let me just read it for one second.

2 Q Sure.

3 A well, I'm a little confused on this. It says,
4 "The parties agree that, except as specifically provided
5 to the contrary in this Agreement, any controversy,
6 claim or dispute arising out of or relating to this
7 Agreement between the Loan Originator, on the one part,
8 and WLG" -- so what does that mean? Oh, this is the
9 World Lending Group?

10 Q Right, it's world Lending Group. That's what
11 I'm asking you.

12 A Okay. Did I recall that?

13 Q Yeah.

14 A I don't recall specifically looking at any of
15 these paragraphs --

16 Q Okay.

17 A -- or concentrating on them.

18 Q So you just didn't pay attention to it; is
19 that right?

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20 A It might have been, in the moment, maybe
21 someone was talking to me while I was signing. You
22 know, "Get this done so we can get your number right
23 away." You know, I don't know.

24 Q And likewise, I think if you turn the page,
25 where it says -- paragraph 11, it says "Governing Law."

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1 It says, "The enforcement of this Agreement shall be
2 governed by the laws of the State of Georgia and venue
3 shall be in Cobb County or Gwinnett County Superior
4 Court; State of Georgia." Do you see that, ma'am?

5 A Yeah. I have no knowledge of that,
6 specifically anyone pointing that out to me or that that
7 might make a difference.

8 Q Okay. I understand that. I think if we look
9 at what we've marked as Exhibit A --

10 MR. AIN: 1.

11 BY MR. GENTILE:

12 Q -- or 1 -- I'm sorry -- that has, also, an
13 arbitration provision in 7.1. Do you see that? I think
14 that's Bates-stamped 004.

15 A Yes.

16 Q You see that, correct?

17 A I see it.

18 Q All right. Do you see Section 11, in that
19 same document, where it says "Governing Law"?

20 A Uh-huh, right.

21 Q Okay.

22 A I see it now.

23 Q All right. I ^{ARRE0512}understand your testimony is you
24 never saw this on 4/2/02?

25 A No.

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1 Q Okay. But you'll note that the language
2 between the two agreements are the same?

3 A They look the same, yes.

4 Q And looking at Exhibit 2 -- I just want to
5 make sure for the record we have it clear -- at the last
6 page of Exhibit 2, Ms. Arreguin, Bates-stamped GEL00 --
7 I'm sorry -- 025 --

8 MR. AIN: Bless you.

9 MR. GENTILE: Thank you.

10 Q -- you see where it says "You must check the
11 following acknowledgments to continue"? Do you see
12 that?

13 A Uh-huh.

14 Q You checked those?

15 A I'm sure I did.

16 Q Those are your check marks, correct?

17 A I'm sure I did.

18 Q Okay. And do you recall when you were
19 assigned the ID AF0099?

20 A Probably 7/29.

21 Q Okay. And you used --

22 A I don't know. I don't know.

23 Q You used that continuously, though, right?

24 A Yes.

25 Q When was the first time that you closed a

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1 loan, if you can recall, for --

2 A It was with ComUnity Lending, was my first
3 loan in that interim process. And the name was Chuck
4 Mulcahy, I believe. I believe he was the first loan,
5 but it was in that interim process.

6 Q Do you remember when that took place, ma'am?
7 Do you have any recollection?

8 A Maybe February, March, April.

9 Q of 2003?

10 A '2.

11 Q 2002. And that would have been through
12 ComUnity Lending as opposed to World Lending Group?

13 A ComUnity Lending, yeah, exactly.

14 Q And how were you able to close a loan through
15 ComUnity Lending? Was there --

16 A Cali Leasing were hired to allow us to do
17 loans. I don't know.

18 Q You signed -- did you sign an agreement with
19 Cali Leasing? You don't remember?

20 A I don't recall.

21 Q Okay.

22 A I must have.

23 Q In or around July 2002, did you have a lawyer
24 that you worked with?

25 A No.

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1 Q You didn't?

2 A No. July of 2002?

3 Q And I take it, after you signed -- or you were
4 approved for World Lending Group, Inc., you then began
5 working on loans for that company, correct?

6 A I believe so.

7 Q And you were able to close loans, correct?

8 A Yes.

9 Q And you were able to get paid, right?

10 A Yes.

11 Q Okay. And the process by which you would get
12 paid would be through the -- I think you would either
13 download or upload the information through the computer
14 system?

15 A The process to get paid or the process to do
16 the loan?

17 Q The process to do the loans.

18 A We would have to go through a loan processor.

19 Q Okay.

20 A And then the loan would close six weeks, or
21 whatever, and then they would submit paperwork and we
22 got paid.

23 Q Would that be through the computer, though, or
24 would that be manually, Ms. Arreguin?

25 A Handing it?

□

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1 Q Yeah.

2 A I believe it was all manual in the beginning.

3 It was always manual. I can't remember that ever

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4 being --

5 Q How about the process of payment? Was the
6 process of payment through the computer?

7 A It was direct deposit.

8 Q It was direct deposit?

9 A And I think that was on down the road. That
10 wasn't initially either.

11 Q Okay. Were you licensed -- did you have any
12 licenses during the time you were working for World
13 Lending Group?

14 A I love that question.

15 Q Tell me why you love it. I'm not talking
16 about a marriage license or driver's license. I'm
17 talking about professional license.

18 A Under the Department of Corporations, World
19 Lending Group was registered -- I didn't realize this
20 until later -- much -- I mean, now later. This is
21 later. World Lending Group was registered under
22 Department of Real Estate, which required a real estate
23 license, okay? We were not licensed. We were under
24 Department of Corporations. Two different entities,
25 okay?

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1 So how did we do loans? If we were going to
2 be under real estate, we were required to have real
3 estate licenses. Now I understand maybe why they said,
4 "You can't do home loans for a while." They kept
5 telling us, "You can't do loans. You can't do loans."
6 So who did our loans for us? Someone else might have

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7 signed for us, or whatever. But under the Department of
8 Corporations -- Global Equity Lending now is under the
9 Department of Corporations. But my understanding is
10 World Lending Group was under the Department of Real
11 Estate, and that required a real estate license. And
12 had that caught up to us, by the Department of Real
13 Estate, we'd all been really hurt.

14 Q But my question to you was, were you --

15 A No.

16 Q Let me reask the question, so we have a clean
17 record.

18 Following your signing on with World Lending
19 Group in July, did you obtain -- or did you have a
20 professional license?

21 A No.

22 Q Okay. You had an insurance license, right?

23 A I gave all that up. Insurance and securities
24 license was -- you know, I let those go. But we
25 didn't -- we weren't required to have a license.

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1 Q When did you first -- when was the first -- if
2 you can recall, first time you did a loan for Global
3 Equity Lending?

4 A Equity Lending?

5 Q Global Equity Lending.

6 A I don't know when -- that transition time. I
7 have no idea.

8 Q I believe you said something in your
9 declaration, and maybe we can look at it. I think it's

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10 Exhibit 4. You said -- I think it's on page -- Global
11 Equity Lending didn't -- wasn't come into existence
12 until August 2003. Does that sound right?

13 A 2002.

14 Q 2002?

15 A Uh-huh.

16 Q Is that correct?

17 A I believe that's what I said. Is that true?

18 MR. AIN: well --

19 BY MR. GENTILE:

20 Q Let's make sure we're not putting words in
21 your mouth. I want you to read it.

22 MR. AIN: I recall that it was Sandy Croteau's
23 declaration that stated that. I don't remember if --
24 until August of '02, in paragraph 1.

25 THE WITNESS: "Additionally, Global Equity

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1 Lending, Incorporated, was not a licensed residential
2 lender in California until August of 2002."

3 BY MR. GENTILE:

4 Q 2002. How did you learn of that?

5 A I looked it up on the computer.

6 Q When did you do that?

7 A Oh, in the last five months.

8 Q Very recently?

9 A Yeah.

10 Q Okay. Is it fair to say, though, that shortly
11 after it became licensed in the state of California, you
12 were able to do loans for Global Equity Lending?

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13 A We always did loans. I don't recall a cutoff.

14 Q You don't recall the first time you did one
15 then, right?

16 A No.

17 Q And you mentioned something about Ms. Croteau.
18 what is your understanding of who Ms. Croteau is?

19 A She was not in HR -- or she was in the
20 background. She wasn't who she is today. She's in a
21 new situation. I believe there was a McGrath in charge
22 of HR, M-c-G-r-a-t-h.

23 Q She was in charge of what, Ms. Arreguin?

24 A HR. At that time, I believe she was signing
25 appointment letters, sample appointment letters,

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1 director of HR.

2 Q Who executed your appointment letter that's
3 attached to Exhibit 4?

4 A Do I have one there? I do. Andy Woodman. He
5 was the president.

6 Q Okay.

7 A I knew him real well. President of World
8 Lending Group.

9 Q If we look at -- I want to pull out some --
10 there is a document here. I'm not going to pull it out,
11 but let's just take a look. In our packet of documents
12 that's marked as Exhibit 3, there is a document that
13 begins with Bates stamp GEL012. I want you to take a
14 look at that, please.

15 A Okay.

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16 Q Just let me know when you're done looking at
17 it. I want to make sure you're familiar with the
18 document.

19 A Okay.

20 Q And that document is called "World Leadership
21 Group, Inc., Associate Membership Agreement." Do you
22 see that?

23 A Yes, I do.

24 Q Okay. And how did you come to get the World
25 Leadership Group, Inc., Associate Membership Agreement?

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1 A I have no idea. You know, again, maybe it was
2 given to me, because it's signed the same date as the
3 World Lending Group. So my start date on this would
4 have also been 7/19/02. I didn't recognize that.
5 Because they always had me in the computer as starting
6 World Leadership Group in April. But this doesn't say
7 that, does it?

8 Q Now, if you look at what has been
9 Bates-stamped as GEL016 -- and counsel will help you
10 locate that --

11 A Okay.

12 Q -- that's page 5 of the World Leadership
13 Group, Inc., Associate Membership Agreement, correct?

14 A Right.

15 Q I assume that's your name, Dolores Arreguin --

16 A Uh-huh.

17 Q -- that's printed there, correct?

18 A Yes.

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19 Q Did you print that?
20 A It seems so, yes.
21 Q Is that your signature?
22 A It seems so, yes.
23 Q And it's dated July 19th, 2002?
24 A Right.
25 Q And you don't recall how you came to get this

82

1 particular agreement?
2 A I don't.
3 Q Do you think Mr. Enloe provided it to you?
4 A Possibly a whole package.
5 Q Okay. And this would have been around the
6 same time that you had -- you signed and you reviewed
7 the world Lending Group, Inc., agreement, correct?
8 A Yes.
9 Q All right.
10 A You know what's really confusing to me on
11 these, though? It's something like this, on the first
12 paragraph, world Leadership Group, it says, hereafter
13 referred to as WLG, World Leadership Group, in that
14 first paragraph, GEL012.
15 Q I see it.
16 A Do you see that?
17 Q Yes.
18 A And if you move to the World Lending one, 021,
19 it says the same thing. Now hereafter we refer to this
20 as WLG. So what company were we referring to? It was
21 really confusing.

ARRE0512

22 Q Okay. Did you ever bring that issue up to
23 anybody?

24 A No.

25 Q Okay.

83

1 A But we lived with that mess for a long time
2 because we didn't know. I mean, both contracts say the
3 same thing.

4 Q If you look at -- in the packet of
5 information, packet of documents that we've marked as
6 Exhibit 4 (sic), if you could go to GEL027.

7 A Got it.

8 Q That document is titled "Employee
9 Acknowledgement Regarding World Lending Group Employee
10 Policy Manual." Do you see that?

11 A Uh-huh.

12 Q Yes?

13 A I do. Yes, I see it.

14 Q Is that your signature at the bottom?

15 A It is.

16 Q And this was one of the documents that was
17 provided to you by Mr. Enloe?

18 A Yes.

19 Q And you dated it 7/19/02?

20 A Yes.

21 Q All right.

22 A There was no policy manual on hand, just to
23 let you know. In fact, I don't think it was ever on
24 hand. And so you notice that nothing -- none of the

ARRE0512

25 blocks are marked because it wasn't available.

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1 MR. GENTILE: I'll move to strike as
2 nonresponsive to the question that I asked.

3 Q And I take it -- if you look at what's been
4 Bates-stamped as GEL029, it's World Lending Group, Inc.,
5 Background Investigation Consent. Do you see that?

6 A I do.

7 Q What was your understanding of what this
8 document was, ma'am, at the time you reviewed it?

9 A They were -- my understanding is they were
10 just going to run a credit check on everyone.

11 Q Okay. And this was a document that provided
12 them the right to do that, correct?

13 A I believe so.

14 Q By the word "consent," correct?

15 A Yes.

16 Q And that's your signature at the bottom there?

17 A Yes.

18 Q It says "Dolores Arreguin," correct?

19 A Yes.

20 Q All right. I'm going to show you some
21 documents. I don't know if I'm going to mark all of
22 them, but I think this is related to the issue at hand
23 here. And this comes from your counsel's disclosure of
24 documents pursuant to the federal court rules. I just
25 have some questions here, just so I understand it. I'm

ARRE0512

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1 going to hand it to you.

2 A Okay.

3 Q It's the full set of documents Bates-stamped 1
4 through 91. And I just want you to take a look at that.

5 Looking at the very first document,
6 Ms. Arreguin, the very first document says on-line
7 sign-up. Do you see that?

8 A Yes.

9 Q Is that your -- did you make that document or
10 create that document?

11 A No.

12 Q Do you know who created it?

13 A I have no idea. Oh, it says "Mike Arreguin."

14 Q Yes. It seems like it came directly from a
15 fax -- a 916 fax from Mike Arreguin. I think that's
16 your son, correct?

17 A Yeah, but where would he send this to?

18 Q I have no idea. I wanted to know if that was
19 a document you created specifically to provide to your
20 lawyer or if it was just a document that was a document
21 that was given to you by Global Equity or World Lending
22 Group; do you know?

23 A I don't know.

24 Q Okay.

25 A I'm sorry.

□

86

1 Q No, that's okay. If you don't know, you don't

ARRE0512

2 know. I just want to know. The next document there
3 is -- it's WLG on-line sign-up. Do you see that?

4 A Okay.

5 Q And that is something you produced to your
6 attorney, I assume?

7 A Yes.

8 Q Okay. And did you have an understanding as to
9 what an on-line sign-up was?

10 A well, by this time, 2006, yes.

11 Q okay.

12 A They were set up to go on-line --

13 Q All right.

14 A -- by 2006.

15 Q All right. When do you know -- when, to your
16 recollection, was they, being World Lending
17 Group/Global Equity Lending, set up to go on-line, sign
18 up on-line?

19 A Possibly -- I'm just -- I'm sorry. I don't
20 want to guess, but maybe --

21 Q I don't want you to guess.

22 A Yeah. I'm sorry. I'm not going to be able to
23 put a specific time frame. I'm going to say six months
24 after July, maybe, they started going on-line a little
25 more.

□

87

1 Q Six months after July 2002?

2 A Yeah.

3 Q Okay. But did you have an understanding of
4 what an on-line sign-up was six months after July 2002?

ARRE0512

5 A Yes, because you could start downloading some
6 paperwork.

7 Q Okay.

8 A You had access to some things you needed.

9 Q In order to obtain that access, you had to
10 type in your name, right?

11 A If you were joining up, now you could go in --
12 you could go in and sign up, pay your money first, and
13 then have access to the documents.

14 Q Okay. But how would you -- what were the
15 mechanics, as far as you recall, for the on-line
16 sign-up?

17 A At what time frame?

18 Q Say six months after July 2002.

19 A Well, it's hard to tell you exactly what, but
20 I believe -- I can't say exactly six months after. I
21 know 2006, you go in and you put your name and your
22 address and all your information, pay your money, and
23 then you would have access to keep going. And that's
24 this entire --

25 Q Got you.

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1 A -- sign-up process. I'm sure this is the
2 entire one.

3 Q okay.

4 A But six months afterwards, I'm not sure what
5 was available.

6 Q Because that's too far back --

7 A Yeah.

8 Q -- for you to remember, correct? ARRE0512
9 A Yes. I'm sorry.
10 Q That's okay. Then when you did that on-line
11 sign-up, you'd have to put in your user password?
12 A Yes.
13 Q Air Force 0099?
14 A No, not if you were a new person. You could
15 start, you know, the whole process without having to go
16 into the web site.
17 Q Okay.
18 A I'm not sure, in 2002, what that process was
19 exactly.
20 Q Okay. Looking at that document that you were
21 looking at --
22 Thank you, Mr. Ain.
23 -- do you recall ever seeing a document
24 similar to this document in or around the July 2002 time
25 frame?

□

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1 A Oh, no. They didn't have this process then.
2 In fact, this document says "GEL" and "GRM." GRM didn't
3 come in until a year and a half after, so that tells you
4 that's way later.
5 Q How did you come to obtain these documents
6 that we're looking at now? Did you print them off?
7 A My girlfriend -- yeah -- no, no. I did print
8 them off, but I was signing up my girlfriend. She
9 wanted to go in and sign up, but she decided against the
10 process.

11 Q okay. Do you know why she did? ARRE0512
12 A Yeah, she's ill. She's very ill.
13 Q okay.
14 A Yeah, she was very ill.
15 Q Just bear with me, please.
16 A She spoke Spanish. She probably couldn't
17 understand this anyway.
18 Q If you look at the document that's
19 Bates-stamped in that batch of documents, which is
20 number 41 --
21 A Okay.
22 Q -- I believe that was produced by your
23 counsel. Tell me, have you ever seen that document
24 before?
25 A This looks like the loan numbers and a list of

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1 loans that I participated in. So that is probably added
2 on-line.
3 Q Okay. I understand that. It looks like the
4 very first loan is a loan, 1934. They have
5 conscientiously redacted the borrowers and the address,
6 but then we go to -- it says date of application,
7 1/8/03. Do you see that, Ms. Arreguin?
8 A Okay.
9 Q Okay. And I think you had said earlier this
10 wasn't the first loan that you closed, there were other
11 loans that closed prior to this one, right?
12 A I believe so.
13 Q That was under a different name, right?

14 ARRE0512
MR. AIN: The Cali --
15 THE WITNESS: ComUnity Lending. And, you
16 know, I got a W-2 from World Lending Group for 2002.
17 BY MR. GENTILE:
18 Q Okay.
19 A So I obviously did some loans.
20 Q All right. I understand that. But the
21 1/8/03, date of application there, do you remember who
22 you closed the loan for?
23 A I don't.
24 Q Okay. I take it -- I'm not trying to put
25 words in your mouth now -- that the stack of documents,

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1 most of them at least, which have information -- there's
2 some unsigned contracts and stuff. Those documents
3 were, I assume, printed or downloaded to facilitate a
4 girlfriend of yours who wanted to --
5 A Right.
6 Q -- purchase -- or wanted to potentially become
7 a member, right?
8 A Right. That's right.
9 Q Okay. And you'll agree with me that none of
10 the documents that are contained in this packet of
11 documents, right, have your signature on it, correct?
12 A I don't think so.
13 Q Why don't you just take a look.
14 A Are you saying any of this has my signature?
15 Q Yes.
16 A That's my first loan, right there, ComUnity

ARRE0512

17 Lending. Right there.
18 Q Okay.
19 A 4/16. There it is right there.
20 Q What's the Bates-stamp number on that?
21 MR. AIN: 72.
22 BY MR. GENTILE:
23 Q 72.
24 A That's my first loan.
25 Q So Document 72 would be your first loan?

□

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1 A Right. And I'm not sure who was after that.
2 I'm thinking my cousin, though, but I don't know.
3 Q That's 4/13/02?
4 A Yeah.
5 Q Okay.
6 A That's with Community Lending.
7 Q Okay. So this April 13th, 2002 -- well, let's
8 strike that.
9 The document Bates-stamped as 000072, which is
10 contained in your disclosure documents, is a federal
11 truth-in-lending disclosure statement, correct?
12 A Right.
13 Q All right. And it has a signature on the
14 bottom there. But that's not -- is your signature
15 there? Am I missing something?
16 A Let's see. I think it's the client's.
17 Q Okay.
18 A The client's signature.
19 Q And that's dated April 13th, 2002, correct?

ARRE0512

20 A Uh-huh.
21 Q And that would represent the very first home
22 loan that you closed?
23 A My signature is on that one, actually.
24 Q Okay. And which is that document there?
25 MR. AIN: 74.

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1 THE WITNESS: 74.
2 MR. GENTILE: So let's pull those two
3 documents out for me, please, and we'll mark those as
4 Exhibit 5.
5 MR. AIN: Which two? 74 and 72?
6 MR. GENTILE: Yeah, 72 and 74. I want to make
7 sure I understand this now.
8 MR. AIN: Okay.
9 (Deposition Exhibit 5 marked.)
10 BY MR. GENTILE:
11 Q What was the name of that person?
12 A Chuck Mulcahy.
13 Q And he's the first fellow that you did -- or
14 you closed a loan for?
15 A Yes.
16 Q When you started working for home loans --
17 A For ComUnity Lending.
18 Q -- for ComUnity Lending?
19 A That interim period.
20 Q All right.
21 A This one, I don't recognize.
22 MR. AIN: Okay. Let's leave that one alone.

23 ARRE0512
THE WITNESS: Okay.
24 MR. AIN: Do you want me to put these back
25 together?

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1 MR. GENTILE: That's fine.
2 Q Just so I understand, ComUnity Lending was
3 like the interim company that you were working with or
4 working for?
5 A Cali -- because they couldn't -- they weren't
6 set up yet to do any loans, so they hooked us up in the
7 interim and you had to work for Cali Leasing. We had to
8 go to Lodi for meetings. And that's who I did my first
9 loan through. I'm trying to remember back then, but
10 that was the first person.
11 Q Who paid you for that loan? Do you remember?
12 A Cali Leasing or -- yeah, I think that's who I
13 got the W-2 from.
14 Q Who directed you to do the work for Cali
15 Leasing -- or do the loan for Cali Leasing? Do you
16 remember?
17 A I remember we signed papers in Carlton Enloe's
18 office. I do remember that. So he might have helped do
19 that process.
20 Q But you don't have any of those documents
21 right now?
22 A What documents? These are it.
23 Q The documents that ultimately facilitated you
24 to do -- or close loans for --
25 A No.

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1 Q -- for Cali Leasing.
2 A I just have a W-2.
3 Q You just have a W-2. And we've marked that as
4 Exhibit 5, correct?
5 MR. AIN: Do you want me to staple those
6 together?
7 MR. GENTILE: That's probably a better thing
8 to do.
9 Do you mind if I staple it?
10 THE REPORTER: Oh, no. Thank you.
11 BY MR. GENTILE:
12 Q In any event, Number 5, so the record is
13 clear, 000074, has your signature on it, correct?
14 A It does.
15 Q You were the loan originator for that
16 gentleman, correct?
17 A Yes, I was.
18 Q All right.
19 A I'm signed on the California disclosure.
20 Q And then if you look at what document is
21 Bates-stamped number 80 in that --
22 A Okay. I love this one. I love this one.
23 Q All right. That is a -- those are W-2s; is
24 that right?
25 A It is.

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1 Q Okay. That's 2003, and it's for world
2 Leadership Group?

3 A There you go.

4 Q Okay. And do you have any w-2s from Global
5 Equity Lending?

6 A In 2003?

7 Q Or at any time.

8 A Yes.

9 Q Okay.

10 A I do.

11 Q Okay. You do. When was the first time you
12 received a w-2 or a W -- from Global Equity Lending?

13 A 2003.

14 Q So you would have that for 2003?

15 A I believe I do.

16 Q Okay. And how about for World Lending Group?

17 A 2002.

18 Q And you have those at home?

19 A I do. They are not here.

20 Q I didn't see it. Okay. So just so I
21 understand, you earned income in 2002 through World
22 Lending Group, correct?

23 A Yes.

24 Q All right. But your w-2 -- but your w-2 for
25 the first loan you did for Mr. Mulcahy, or whatever his

□

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1 name is, that came from a separate entity?

2 A Yes.

3 Q And then in 2003, you earned income from
Page 87

ARRE0512

4 Global Equity Lending?

5 A I believe I have a W-2 saying "Global Equity
6 Lending" from 2003.

7 Q Okay.

8 A I believe so.

9 Q All right.

10 A This World Leadership Group was the only one I
11 ever got.

12 Q We're just about done here.

13 MR. AIN: Do you want Bates-stamped 80 -- I
14 mean, marked as an exhibit?

15 MR. GENTILE: No, I'm not going to mark it as
16 an exhibit. It's okay. Thank you anyway.

17 Q And I apologize if I've asked this question.

18 Do you recall when Global Equity Lending,
19 Inc., changed its -- well, strike that.

20 Do you recall when World Lending Group changed
21 its name to Global Equity Lending, Inc.?

22 A I don't recall the time frame. It seems like
23 a year and a half later.

24 Q Okay. You said in your declaration, "It is my
25 understanding that World" Lending "Group, Inc., is the

□

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1 parent company of Global Equity Lending, Inc.," correct?

2 A Say that again. I'm sorry.

3 Q You stated in your declaration -- let's pull
4 that out.

5 A World Leadership Group is the parent company.

6 MR. AIN: What paragraph, Counsel?
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7 MR. GENTILE: Paragraph 1.

8 MR. AIN: Okay.

9 BY MR. GENTILE:

10 Q Do you see where it says, "It is my
11 understanding that World Leadership Group, Inc., is the
12 parent company of Global Equity Lending, Inc.," correct?

13 A Yes.

14 MR. GENTILE: Can we go off the record for a
15 minute. Let me check my notes.

16 (Recess.)

17 BY MR. GENTILE:

18 Q I just want to follow up on a couple of
19 things, Ms. Arreguin.

20 A Okay.

21 Q Have you ever been a plaintiff or a defendant
22 in any other lawsuit other than this lawsuit?

23 A Yes.

24 Q Okay. How many times?

25 A Oh, one or two.

□

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1 Q One or two?

2 A Yeah, one or two. Maybe two or more.

3 Q What were the nature of the complaints?

4 A One was a mold issue. I got very sick out of
5 that.

6 Q Okay. Was that attendant to a real estate
7 contract or something like that?

8 A No, it was an apartment mold.

9 Q All right. Have you ever been involved in a
Page 89

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10 lawsuit regarding a contract or agreement which was in
11 dispute?

12 A I don't recall that, no.

13 Q what other --

14 A Maybe an accident, you know, neck.

15 Q Personal-injury type thing?

16 A Yeah, personal-injury thing, right.

17 Q You were in the air force?

18 A I was in the civilian air force.

19 Q You were in the civilian. How long were you
20 in the civilian air force?

21 A 25 years.

22 Q What did you do in the air force?

23 A I love that question. No, I actually worked
24 for the Stealth F117 and F22 Raptor, and I was a
25 security manager.

□

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1 Q You were a security manager. What does a
2 security manager do?

3 A We make sure our classified is protected, from
4 development to the end.

5 Q Did that involve --

6 A It's above top secret.

7 Q Okay. I don't want to get into top secret
8 stuff.

9 MR. AIN: Me neither.

10 THE WITNESS: It's above.

11 BY MR. GENTILE:

12 Q You didn't --

ARRE0512

13 A I'll have to kill you. That's all.

14 Q During the course of your work in the air
15 force, did you have any experience reviewing contract
16 documents or anything like that?

17 A I did not.

18 Q Okay. What is your educational background?

19 A A little bit of college.

20 Q Okay.

21 A A lot of government education.

22 Q Okay. Tell me about -- what college did you
23 go to?

24 A Sierra.

25 Q Sierra College?

□

101

1 A Yeah, very little.

2 Q What did you study?

3 A Interior decorating.

4 Q Okay.

5 A Accounting. I thought I wanted to do that,
6 which was never.

7 Q Okay.

8 A And that's about it.

9 Q Did you take any law courses at all?

10 A No.

11 Q No legal courses?

12 A No.

13 Q You said you took classes or you were educated
14 with the air force?

15 A A lot of security training.

ARRE0512

16 Q Okay. What did that --
17 A Security development of -- you know, where our
18 important stuff goes from one end to the other.
19 Q None of that --
20 A Development.
21 Q Did any of that training involve the reading
22 or interpretation of contracts?
23 A No. Mine was more of a physical, out there,
24 checking the drawers and the programs.
25 Q Okay. And when was the last -- have you ever

□

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1 spoken to Sandy Croteau?
2 A Yes.
3 Q When was the last time you spoke with her?
4 A Maybe prior -- two years before I resigned.
5 Q Okay. And what was that conversation? What
6 did that conversation relate to?
7 A I had some trouble with team members.
8 Q You were the team members' supervisor?
9 A I was a director.
10 Q Okay.
11 A And they were in my line.
12 Q Okay. They were down line to you?
13 A Down line to me.
14 Q You had some problems with them?
15 A Yes.
16 Q And you went to Sandy for help?
17 A Sandy was in charge.
18 Q Did you ever talk to Sandy at all about any of

ARRE0512

19 the contract documents --

20 A No.

21 Q -- like we looked at some contracts --

22 A No.

23 Q -- Exhibits 2, 3, 4?

24 A No.

25 Q All right. There's a couple more questions.

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1 Do you recall, while you were working for
2 either World Lending Group or Global Equity Lending,
3 that you had to undergo any kind of compliance review?

4 A I'm going to say no.

5 Q You don't recall?

6 A I don't recall.

7 Q You don't recall. And if you don't recall
8 that, you don't recall any of the mechanics, correct --

9 A No.

10 Q -- that would be involved with that?

11 A Yeah. I think they had some auditing, but it
12 didn't -- wasn't with our office. It wasn't with us.

13 Q Okay. And I apologize if I've asked this
14 question to you before. I just want to be complete.
15 You did not keep any of the documents you signed with
16 either World Lending Group or Global Equity Lending,
17 Inc.; is that correct?

18 A I believe that's correct.

19 Q Okay.

20 A I think I sent you all this. This is what I
21 had, right here, right?

ARRE0512

22 Q Yeah, absent what we've taken out as a --
23 A I don't think I have anything.
24 Q I take it, though, you did go through some
25 kind of training with World Lending Group?

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1 A What kind of training?
2 Q To learn how to -- what you needed to do to
3 present mortgage loans.
4 A In the beginning, really, they didn't know a
5 lot about it. Walking through the loan was a
6 learning -- I studied with a little processor one hour
7 on Fridays. She was the best processor there ever was,
8 and taught me how to do loans. That's the truth.
9 Later on, maybe they had a lot of classes and
10 all this stuff, but not -- that's how I learned how to
11 do loans.
12 MR. GENTILE: Okay. I don't have anything
13 further. Thank you very much.
14 Do you have any questions?
15 MR. AIN: I have no questions.
16 MR. GENTILE: We're done.
17 (Discussion off the record.)
18 MR. GENTILE: We've concluded with
19 Ms. Arreguin's limited deposition here.
20 We have come to a stipulation. The court
21 reporter will ensure that we will obtain -- or I will
22 obtain a copy of the transcript no later than May 28th.
23 It will be sent to me by e-mail. On or about that same
24 date, I will send it directly to Mr. Ain by e-mail, who

ARRE0512

25 will then ensure that Ms. Arreguin obtains it,

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1 hopefully, within the same day. Ms. Arreguin will have
2 three days, following that time period, to make any
3 changes or corrections to her deposition. And any
4 changes that are made, I will be advised of the same no
5 later than close of business on Wednesday, June 4th.

6 Is that okay, Mr. Ain?

7 MR. AIN: So stipulated, Counsel.

8 MR. GENTILE: Okay. We're all set.

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1 PENALTY OF PERJURY

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10 I, DOLORES A. ARREGUIN, do hereby declare
11 under penalty of perjury that I have read the foregoing
12 transcript; that I have made any corrections as appear
13 noted, in ink, initialed by me, or attached hereto; that
14 my testimony as contained herein, as corrected, is true
15 and correct.

16 EXECUTED this _____ day of _____,
17 20 _____, at _____, _____.
18 (City) (State)

19

20

21

DOLORES A. ARREGUIN

22

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1 I, the undersigned, a Certified Shorthand

ARRE0512

2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken
4 before me at the time and place herein set forth; that
5 any witnesses in the foregoing proceedings, prior to
6 testifying, were duly sworn; that a record of the
7 proceedings was made by me using machine shorthand which
8 was thereafter transcribed under my direction; that the
9 foregoing is a true record of the testimony given.

10 Further, that if the foregoing pertains to the
11 original transcript of a deposition in a Federal Case,
12 before completion of the proceedings, review of the
13 transcript [] was [] was not requested.

14 I further certify I am neither financially
15 interested in the action nor a relative or employee of
16 any attorney or party to this action.

17 IN WITNESS WHEREOF, I have this date
18 subscribed my name.

19

20 Dated: _____

21

22

23

24

25

KATHY NELSON
CSR No. 9796

□

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June 2, 2008

Via Facsimile (408) 918-4501 and U.S. Mail

Gregory M. Gentile, Esq.
ROPERS MAJESKI KOHN BENTLEY
50 West San Fernando Street, Suite 1400
San Jose, CA 95113

Re: *Dolores Arreguin v. Global Equity Lending*

Dear Mr. Gentile:

Plaintiff, Dolores Arreguin, has reviewed her deposition transcript and made the following changes:

Page:line

16:7, change to "I do not recall."

16:9, change to "I do not recall. My application date shows signed July 19, 2002."

21:1, change to "6 & 63."

75:8, change to "I do not recall the exact time frame when I was able to sign my own loans."

76:7, change to "paid by check first, then direct deposit later when became automated."

79:13, change to "We always did loans, but I do not recall when we started. I don't recall a cutoff."

82:24, change to "No. I did not notice it before."

91:5, change to "right, sign up."

94:17, change to "I do not recall."

Gregory M. Gentile, Esq.
June 2, 2008
Page 2

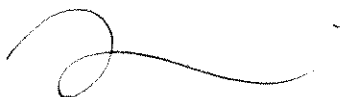
97:10-11, change to " this World Leadership Group 1099 was the only one I ever got for a ring they awarded me."

100:13, add: "that's a joke!"

If you have any questions, please do not hesitate to contact me.

Very truly yours,

LAW OFFICES OF HERBERT HAFIF

A handwritten signature in black ink, appearing to read "Farris E. Ain". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail that extends to the right.

Farris E. Ain

FEA:gs

**** Transmit Conf. Report ****P. 1
LOHH

Fax 9096257772

Jun 2 2008 01:37pm

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14089184501	Normal	02:01:36pm	0'35"	3	# 0 K	

Fax Cover Sheet¹

Law Offices of Herbert Hafif
269 West Bonita Avenue
Claremont, California 91711
909/624-1671
Fax 909/625-7772

To: Gregory M. Gentile, Esq.
With: ROPERS, MAJESKI, KOHN & BENTLEY
Fax No: (408) 918-4501
From: Gwen/Farris E. Ain, Esq.
Reference: Arreguin v. Global Equity Lending, Inc.
Date: June 2, 2008

No.	Document	No. of Pages ²
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4.		

Comments:

☒ Original will follow.
☐ Other message:

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